

REMARKS

Claims 1-7 and 18-26 are presently pending.

Claims 1-5, 7, 8, 18-21 and 25 stand rejected under 35 U.S.C. 102(b) as being anticipated by FR2717165 to Andre et al. The applicants respectfully submit that claims 1-5, 7, 18-21 and 25, as presently recited, are not unpatentable over Andre.

Andre discloses an apparatus for attaching painted paper strips 4, 5 and 6 to a support sheet 3. The sheets are gripped by clamps 8b on a lateral side of the sheet, *i.e.*, a non-leading edge, and are moved on a transfer table 7 via a conveyor 8.

In contrast, each of the claimed apparatus recite mechanisms or members for pulling their sheets by a leading edge of the sheets. More specifically, the apparatus recited in claim 1, and by dependency in claims 2-6, has a gripping mechanism closing onto a leading edge of a sheet for pulling the sheet downstream through the stations. Claim 1 further recites that the mechanism grips the leading edge of the sheet to substantially maintain the leading edge of the sheet in a generally constant orientation. The apparatus recited in claim 7 has sheet engaging members associated with a sheet for pulling the sheet through the adhesive applying station and the swatch applying stations via the leading edge of the sheet. The apparatus of claim 18, and by dependency in claims 19-26, recites that the gripper mechanism pulls the sheet by a leading edge from the feeding station through the adhesive applying station and through the swatch applying station to the receiving station.

Gripping a non-leading edge of a sheet and sliding the sheet sideways, as disclosed in Andre, has a different result as compared to pulling a sheet by a leading edge, as recited in claims 1-7 and 18-26. As discussed in the background section of the present application, a problem with prior art machinery is that at "higher speeds, the front or leading edge of the sheet tends to lift up, allowing air to flow underneath the sheet." This is described as being a problem, because when "sheets float, there are increased occurrences of misfeeds and misprints." (App. p. 4.) An apparatus that does not pull sheets, such as that disclosed in Andre, can have this float problem at high speeds, and may not be able to substantially maintain the leading edge of the sheet in a generally

constant orientation due to air flow beneath the sheet and a lack of a grip on the leading edge of the sheet.

In addition, the gripping mechanisms of claim 1, the sheet engaging members of claim 7, and the gripper mechanisms of claim 18 are each distinguishable from the clamps recited in Andre because each of the claimed mechanisms or members moves the sheets through stations. As discussed above, the clamps of Andre grasp the side edges of the sheets as opposed pulling the sheets from their leading edges. Because the clamps of Andre grasp the lateral side edges of the sheet, there is no concern about the size of the clamps, and certainly no concern about the clamps being capable of directing the sheets through various stations, as recited in claims 1-7 and 18-26.

For example, claim 1 recites that the mechanism pulls the sheet through the stations without interfering with operations of the adhesive applying station and swatch applying stations. Claim 7 recites that the sheet engaging members have low profiles so as to fit between closely spaced operating members in operating areas of the stations. This allows the sheets to be pulled through the stations. There is no concern, and hence no disclosure, of reducing interference between operations of the stations and the clamps of Andre, as recited in claim 1, because of clamping the sheets on their sides, away from the stations. Similarly, there is no need to fit the clamps of Andre between closely spaced operating members in operating areas of the stations, as recited in claim 7. The apparatus of claim 18 has its mechanisms pass beneath one or more cylinders of at least one of the one or more swatch applying stations, where each of the cylinders has an axis of rotation generally perpendicular to a machine feed direction.

Claims 1-5, 7, 8, 18-23, 25 and 26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Andre in view of any one of U.S. Patent No. 4,799,664 to Burger, U.S. Patent No. 5,169,285 to Muller, or U.S. Patent No. 5,007,629 to Eberle et al. The applicants respectfully submit that claims 1-5, 7, 18-23, 25 and 26 are not unpatentable over Andre in view of any one of Burger, Muller, or Eberle.

As discussed above, Andre does not disclose using a mechanism or member to pull sheets through various stations. Instead, Andre discloses the use of clamps along a lateral edge of a sheet, as opposed to the leading edge of a sheet, to direct the sheet along a

transfer table. However, neither Burger, Muller or Eberle disclose pulling sheets through stations. In fact, Burger, Muller and Eberle each teach away the claimed apparatus of claims 1-5, 18-23, 25 and 26, as presently recited, and thus are not properly combinable with Andre. Moreover, no motivation is provided for their proposed combination.

Burger merely discloses a gripper mechanism for transferring sheets between stations, as opposed to through stations as in the presently claimed apparatus. For example, Burger discloses the gripping of a sheet after emerging from a printing station. (Col. 3, ll. 52-59.) Burger further describes a use of its gripping mechanisms "in the form of an inverter apparatus 50 of a sheet feeder and inverter apparatus between two printing machines 3, 5..." (Col. 4, ll. 10-12.)

Muller discloses an object of its apparatus is to simply transport sheets between a source of stacked sheets and a receiving station for individual sheets. (See col. 1, ll. 55-59.) Muller further describes that the sheets in the stack can already have printed matter thereon (Col. 3, ll. 21-22.) Similarly, Eberle discloses that printed products 12, 14 are delivered to the gripper elements 18 (col. 5, ll. 52-54), as opposed to the gripper elements directing the products through printing stations. Nowhere do Muller or Eberle disclose that their apparatus can be used to pull sheets through various stations.

In contrast to Burger, Muller and Eberle, the apparatus recited in claims 1-5, 18-23, 25 and 26 use mechanisms and members that pull the sheets through various stations, thereby eliminating the complex timing of multiple mechanisms for delivering and then picking up a sheet from a station and reducing the potential for misfeeds. With respect to claim 1, and by dependency claims 2-5, neither Burger, Muller, nor Eberle disclose a gripper mechanism for pulling a sheet downstream through stations. With respect to claim 7, neither Burger, Muller, nor Eberle disclose a single set of sheet engaging members associated with a sheet for pulling the sheet through an adhesive station and a swatch applying station. With respect to claim 18, and by dependency claims 19-23, 25 and 26, neither Burger, Muller, nor Eberle disclose a gripper mechanism that pulls a sheet from a feeding station, through an adhesive applying station, through a swatch applying station and to a receiving station.

The type of sheet clamps that merely transfer sheets between stations, such as those disclosed in Burger, Muller, and Eberle, as opposed to the claimed mechanisms and members that pull the sheets through various stations, are described in the present application as being part of the problem of the prior art: "The timing of multiple sets of feed fingers must be coordinated so that as a sheet leaves a station a new set of feed fingers are positioned to push the sheet to the next station. If the timing is not correctly coordinated, misfeeds may occur." (App. at p. 3.) Misfeeds are described in the present application as being undesirable because "the swatch applying machinery must be stopped while the misfed sheet or sheets are removed and the machinery reset for continued operation." (App. at p. 3.)

Claim 6 stands rejected as being unpatentable over Andre either alone or in view of any one of Burger, Muller or Eberle. The applicants respectfully submit that claim 6 is not unpatentable over the cited references for the reasons discussed above with respect to claim 1, from which claim 6 depends.

Claim 24 stands rejected as being unpatentable over Andre either alone or in view of any one of Burger, Muller or Eberle and in further view of either one of Burger or Eberle. The applicants respectfully submit that claim 24 is not unpatentable over the cited references for the reasons discussed above with respect to claim 18, from which claim 24 depends via intervening claims.

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For the reasons set forth above, the Applicants respectfully requests reconsideration and allowance of claims 1-7 and 18-26. Please charge any fees required by this amendment to Deposit Account No. 06-1135.

Respectfully submitted,

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